

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

LAURA M. PORTELA,)
Plaintiff)
vs.) C.A. NO. 05-10844 MEL
WAL-MART STORES EAST, LP,)
Defendant)

JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1(D)

The parties, by and through counsel, state that they have conferred in this matter and hereby submit their Joint Statement Pursuant to Local Rule 16.1(D).

A. Proposed Pre-Trial Schedule

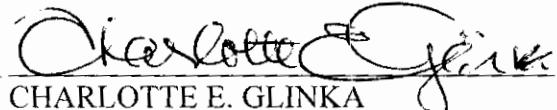
1. Amendments to pleadings to add parties by: November 1, 2005
 2. Completion of written discovery and fact depositions by: January 30, 2006
 3. Plaintiff's designation of expert witnesses by: March 15, 2006
 4. Defendant's designation of expert witnesses by: May 2, 2006
 5. Expert depositions by: August 1, 2006
 6. Dispositive Motions by: September 15, 2006
 7. Final Pre-Trial Conference by: October 14, 2006

- B. The parties have not yet determined whether they will consent to trial by magistrate judge.
 - C. The plaintiff has presented a written settlement proposal to the defendant.
 - D. The parties' certifications pursuant to Local Rule 16.1(D)(3) will be submitted.

Respectfully submitted,

The plaintiff,
By her Attorneys,

KECHES & MALLEN, P.C.



CHARLOTTE E. GLINKA
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122 Dean Street
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The defendant,
By its Attorneys,

CRAIG AND MACAULEY, P.C.



ANNA L. JOHNSON
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Federal Reserve Plaza
600 Atlantic Avenue
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(617) 367-9500

DATED: August 25, 2005
Jt Stmt-16.1D3

CERTIFICATE OF SERVICE

I, Charlotte E. Glinka, of Keches & Mallen, P.C., counsel for the plaintiff, hereby certify that on this 25th day of August, 2005, I served the parties' **Joint Statement Pursuant to Local Rule 16.1(D)**, by forwarding a copy of same by first-class mail, postage prepaid, to:

Richard E. Quinby, Esquire
Anna L. Johnson, Esquire
CRAIG AND MACAULEY, P.C.
Federal Reserve Plaza
600 Atlantic Avenue
Boston, MA 02210



CHARLOTTE E. GLINKA

CertSvc2

KECHES & MALLEN, P.C.

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August 25, 2005

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VIA FEDERAL EXPRESS

Civil Clerk's Office
UNITED STATES DISTRICT COURT
John Joseph Moakley U.S. Courthouse
1 Courthouse Way
Boston, MA 02210

*RE: Laura Portela vs. Wal-Mart Stores East, LP
United States District Court, C.A. No. 05-10844 MEL*

Dear Madam or Sir:

Enclosed with reference to the above matter and the Scheduling Conference on September 1, 2005, please find the following for docketing and filing:

1. Joint Statement Pursuant to Local Rule 16.1(D); and
2. Certificate of Service.

Thank you for your attention to the foregoing.

Very truly yours,

KECHES & MALLEN, P.C.


Charlotte E. Glinka

CEG/dkd
Enclosures
FedCrt3-JtStmt

cc: Anna L. Johnson, Esquire